REMARKS

This communication is a full and timely response to the aforementioned non-final Office Action dated April 26, 2007. By this communication, claims 1, 2, and 5 are amended. Claims 1-16 remain pending. Reconsideration and allowance of this application are respectfully requested.

Claim Objections

Claims 1, 2, and 5 were objected to for alleged informalities. Applicants have amended these claims for clarity and respectfully submit that the scope of claims has not changed. Withdrawal of this objection is respectfully requested.

Rejections Under 35 U.S.C. § 103

Claims 1-16 were rejected under 35 U.S.C. §103(a) as unpatentable over *Utsunomiya* (U.S. Patent No. 6,999,186) in view of *Kizaki* (U.S. Pub. No. 2003/0035142) and further in view of *Terajima* (U.S. Patent No. 5,309,251). Applicants respectfully traverse this rejection.

In the rejection, the Patent Office alleges that *Utsunomiya* teaches every element recited in independent claims 1 and 14 and dependent claim 9 except for a controller. The Office relies on *Kizaki* and *Terajima* in an effort to remedy these deficiencies.

As recited in the claims, Applicants' controller stores <u>processed job image data</u> in a first storage destination memory for a second output session and beyond it an expansion memory is mounted and stores <u>input job image data</u> in a second storage destination memory for a second output session and beyond if the expansion memory is not mounted.

The Office addresses this feature by relying in part on both *Utsunomiya* and *Terajima*. The rejection, however, fails to indicate whether processed or input image data is being stored in memory. Upon close inspection of the references, *Utsunomiya* stores rasterized (processed) image data in the RAM and hard drive when multiple copies are to be printed. *Terajima*, on the other hand, discloses that a communication result and a device ID, which are not image data, can be stored in an expansion memory.

Kizaki discloses that an image memory includes primary and secondary memory devices, with the secondary memory device storing the same type of image data as the primary memory device for multiple copying applications.

It would be readily apparent to one of ordinary skill that none of the applied references when applied individually or in the alleged combination disclose or suggest every element recited in Applicants' claims. Thus, Applicants' respectfully submit that a *prima facie* case of obviousness has not been established.

Regarding claim 8, Applicants submit that the applied references fail to articulate a reason to combine the known elements in a manner to achieve Applicants' claimed result for the reasons that follow.

Kizaki discloses an image processing unit 402 that includes a primary memory device 606 and a secondary memory device 607. The primary memory device 606 is implemented as a dynamic random excess memory (DRAM) that is capable of high speed access so that the writing/reading of data at a specified area of memory can be performed at the required speed of data transfer at the time of inputting/outputting of image data (see pgph. [0111]). The secondary memory device 607 is implemented as a mass-storage nonvolatile memory (hard disk drive)

for synthesizing and/or sorting scanned images and storing image data (pgph [0117]). When presented with a multiple copy job, image data captured by the scanner is inputted into the primary memory device 606. The image data is then output from the primary memory device 606 to the image forming device, and at the same time stored in the secondary memory device 607. In printing the second and subsequent copies, the image data is output from the secondary memory device 607 and the primary device 606, to the image forming device (pgph [0118]).

Terajima discloses a facsimile apparatus that enables an external memory to be detachably loaded. When a sensor detects that the external memory is loaded, a received communication result is stored in the external memory. Alternatively, when a sensor detects that an external memory is not loaded, the communication result is stored in a RAM of the main body. If an external memory is later loaded through the main body, the communication results stored in the RAM is then copied to the external memory. The communication result includes information such as, telephone number and name of the communication partner, ID information, start time, communication time, number of sheets, communication status, and any monetary charge assessed to the communication. See Figs. 1-3. It does not include image data.

The Examiner alleges that Utsunomiya and Kizaki together disclose an image forming apparatus that stores data in an internal image memory that contains a primary memory device 606 and a secondary memory device 607 and accesses data from this memory to execute a multiple copy print job. The primary memory device being implemented through RAM and the secondary memory device being implemented through a hard drive or optical-magnetic disc drive. Both memory

devices store processed image data, neither stores input image data. Furthermore, neither the *Utsunomiya* nor *Kizaki* patents contemplate the use of a mountable expansion memory device for storing image data.

The Examiner further alleges that when combining the disclosure of *Terajima* with the disclosures of *Utsunomiya* and *Kizaki*, provision is set forth for sensing an external memory device. However, this device is merely used for storing data with respect to a communication result not image data. *Terajima* neither discloses nor suggest the storage or retrieval of image data from the external memory. In particular, the memory device of *Terajima* includes a read only memory (ROM) for storing ID information for the memory device, and a RAM for storing a communication result. Thus, because *Utsunomiya* and *Kizaki* fail to contemplate the use of external memory to store image data and *Terajima*, while using an external memory, fails to contemplate storing image data in this memory, Applicants challenge whether the combination as suggested by the Office achieves the claimed results. Stated differently, even if *Utsunomiya*, *Kizaki*, and *Terajima* are properly combinable, Applicants' claimed controller is not rendered obvious. More importantly, it appears that any motivation or suggestion to combine these references is found not in the references themselves, but rather is improperly derived from Applicants' disclosure. Accordingly, Applicants submit that a *prima facie* case of obviousness has not been established.

Based on the above arguments, Applicants request that the rejection of independent claims 1, 8, and 14 and their corresponding depending claims under 35 U.S.C. §103 be withdrawn.
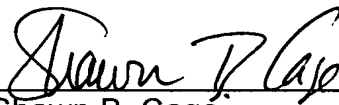
Conclusion

Based on at least the foregoing amendments and remarks, Applicants submit that claims 1-16 are allowable, and this application is in condition for allowance. In the event any issues remain, the Examiner is invited to contact Applicants' representative identified below.

Respectfully submitted,

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Date: __July 24, 2007__   By: _____

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